IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

FACTORY MUTUAL INSURANCE : Civil Action No. 05-96 JJF

COMPANY, a/k/a FM GLOBAL

a/s/o Catalog Resources, Inc. d/b/a ClientLogic : a subsidiary of ClientLogic Operation Corporation :

and THE HARTFORD a/s/o Vivre, Inc.

JURY OF TWELVE DEMANDED

Plaintiffs,

,

v.

EAST COAST ERECTORS, INC., LIGHTHOUSE CONSTRUCTION, INC., BECKER MORGAN GROUP, INC., and O'DONNELL, NACCARATO & MACINTOSH, INC.

Defendants.

DEFENDANT EAST COAST ERECTORS, INC.'S ANSWER TO CROSS-CLAIMS OF DEFENDANT LIGHTHOUSE CONSTRUCTION, INC.

COMES NOW East Coast Erectors, Inc., Defendant in the above-styled action (hereinafter called "ECE") and responds to the cross-claims asserted by Defendant Lighthouse Construction, Inc. as follows:

- 1. Denied.
- 2. Denied.
- 3. Denied. By way of further response, the contract between ECE and O'Donnell, Naccarato & MacIntosh speaks for itself.
 - 4. Denied.
 - 5. Denied.

WHEREFORE, ECE demands that judgment be entered in its favor and against Lighthouse Construction, Inc. with respect to its cross-claims.

WETZEL & ASSOCIATES, P.A.

/s/ Natalie M. Ippolito_

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Attorneys for Defendant East Coast Erectors, Inc.

Dated: September 20, 2005

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2005, I electronically filed the within **Defendant East Coast** Erectors, Inc.'s Answer to Cross-Claims of Defendant Lighthouse Construction, Inc. with the Clerk of Court using CM/ECF which will send notification of such filing to the following:

Chrissinger & Baumberger David L. Baumberger, Esquire Three Mill Road, Suite 301 Wilmington, DE 19806

James F. Bailey, Jr., Esquire Bailey & Associates Three Mill Road, Suite 306A Wilmington, DE 19806

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Victoria K. Petrone, Esquire Tighe, Cottrell & Logan, PA PO Box 1031 Wilmington, DE 19899

I hereby certify that on September 20, 2005, I mailed by United States Postal Service, the document to the following non-registered participants:

Geoffrey W. Veith, Esquire Rogut McCarthy Troy, LLC One First Avenue – Suite 410 Conshohocken, PA 19428

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